BROOKS CITY BASE PROJECT

ENVIRONMENTAL ISSUES

OVERVIEW

- **BACKGROUND**
- **BROOKS CITY BASE PROJECT**
- **ENVIRONMENTAL ISSUES**

BACKGROUND - BROOKS AIR FORCE BASE

- 1300 ACRES (APPROX. 500 UNDEVELOPED ACRES)
- OPENED IN 1918 AS PILOT TRAINING BASE
- SCHOOL OF AVIATION MEDICINE MOVED TO BROOKS IN 1927
- FLYING DISCONTINUED IN EARLY 1960s

BACKGROUND - BROOKS AIR FORCE BASE CONTINUED

- TODAY'S MISSIONS
  - TRAINING - 7,000 MEDICAL PERSONNEL ANNUALLY
  - ACQUISITION - 41 PROGRAMS
  - RESEARCH - FLIGHT RELATED RESEARCH
  - MITIGATION OF HEALTH RISKS
  - WORLD-WIDE ENVIRONMENTAL SERVICES

BROOKS CITY BASE PROJECT

- FIRST, THE BROOKS CITY BASE CONCEPT (BCBC)
  - GOALS
    - REDUCE BASE OPERATING COSTS
    - ENHANCE MISSION EFFECTIVENESS
  - PILOT PROJECT
  - END STATE - HIGH TECH “BUSINESS PARK”

BROOKS CITY BASE PROJECT CONTINUED

- ACCOMPLISHING BCBC
  - OUTGRANT TO CONSTRUCT AND OPERATE TRANSIENT STUDENT LODGING
  - PRIVATIZE MILITARY FAMILY HOUSING
  - OUTGRANT UNDEVELOPED LAND FOR NON-AIR FORCE USE
  - OUTGRANT UNDERUTILIZED BUILDINGS

BROOKS CITY BASE PROJECT CONTINUED

- NOW, THE NEW BROOKS CITY BASE PROJECT (BCBP)
  - GOAL - REDUCE COSTS AND ENHANCE MISSION EFFECTIVENESS
  - HOW? - CONVEY THE BASE AND LEASE BACK MISSION ESSENTIAL PROPERTY

BROOKS CITY BASE PROJECT CONTINUED

- **NEW LEGISLATION (BROOKS EFFICIENCY PROJECT)**
  - **AUTHORIZES CONVEYANCE AND LEASE BACK**
  - **ESTABLISHES “PROJECT FUND” - MONIES GAINED USED AT BASE**
  - **RECOGNIZES OUTGRANT AUTHORITY**
  - **TAKES EFFECT 15 JUNE 2000**

ENVIRONMENTAL ISSUES (AF BASE V. CITY OWNED)

- PLANNING LAWS
- COMPLIANCE LAWS

PLANNING LAWS

- **NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)**
- **ENDANGERED SPECIES ACT (ESA)**
- **CONSERVATION PROGRAMS ON MILITARY RESERVATIONS (SIKES ACT)**
- **NATIONAL HISTORIC PRESERVATION ACT (NHPA)**
- **EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW (EPCRA)**
- **ENVIRONMENTAL JUSTICE**

COMPLIANCE LAWS

- CLEAN AIR ACT (CAA)
- 10 U.S.C. 2692
- RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
- CLEAN WATER ACT (CWA)
- COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT (CERCLA)
- FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT (FIFRA)
- LOW-LEVEL RADIOACTIVE WASTE POLICY ACT (LLRWPA)
- TOXIC SUBSTANCES CONTROL ACT (TSCA)

NEPA

- **MUST ANALYZE IMPACTS OF FEDERAL ACTIONS**
- **BIG IMPACT!!**
- **ENVIRONMENTAL ASSESSMENT (EA) OR ENVIRONMENTAL IMPACT STATEMENT (EIS)?**
  - **DID EA FOR CITY BASE CONCEPT**
    - **CONCEPT = PROPOSED ACTION?**
    - **HYPOTHETICAL SITUATIONS?**
  - **EIS FOR CITY BASE PROJECT**
    - **GO DIRECTLY TO EIS**
    - **WHAT IS THE PROJECT?**

ESA

- **PROTECTION FOR ENDANGERED PLANT AND ANIMAL SPECIES, AND THEIR HABITATS**
- **NO THREATENED OR ENDANGERED SPECIES ON BROOKS AFB; HOWEVER, ENDANGERED SPECIES WITHIN AREA OF EDWARDS AQUIFER**
  - **NO DIRECT IMPACT FROM BROOKS AF**
  - **MINIMAL INDIRECT IMPACT**

SIKES ACT

- **REQUIRES CONSERVATION AND REHABILITATION OF NATURAL RESOURCES**
- **MUST WORK WITH USFWS AND STATE OF TEXAS**

NHPA

- REQUIRED TO PROTECT CULTURAL RESOURCES
- ONLY THREE BUILDINGS AFFECTED - WWI HANGER, SMALL ARMORY AND OFFICE BUILDING

EPCRA

- **STATE AND LOCAL PLANNING FOR CHEMICAL EMERGENCIES**
- **WILL BROOKS CONTINUE AS AN AFB OR PART OF CITY?**

ENVIRONMENTAL JUSTICE

- REQUIREMENT FOR GREATER MINORITY PARTICIPATION IN PLANNING PROCESS
- WHAT IS IMPACT OF PROPOSED PROJECT ON SURROUNDING COMMUNITY?

CAA

- **STATUTORY PROGRAMS DESIGNED TO IMPROVE AIR QUALITY**
- **SAN ANTONIO IS ABOUT TO BECOME "NON-ATTAINMENT" AREA**
  - **IMPACT OF NEW DEVELOPMENT?**
  - **NEW AIR PERMITS?**
- **INCREASE OF COMPLIANCE COSTS TO USAF?**

10 U.S.C. 2692

- **PROHIBITS NON-DOD ORGANIZATIONS FROM BRINGING HAZARDOUS MATERIALS ON BASE**
- **PROBABLY NO PROBLEM WITH TRANSFER TO CITY**

RCRA

- **“CRADLE-TO-GRAVE” MANAGEMENT OF HAZARDOUS WASTE**
- **BROOKS AFB IS SMALL QUANTITY GENERATOR**
- **WHAT IS THE FACILITY?**
- **WHO IS RESPONSIBLE?**
- **BUILDINGS CONTAIN LEAD-BASED**

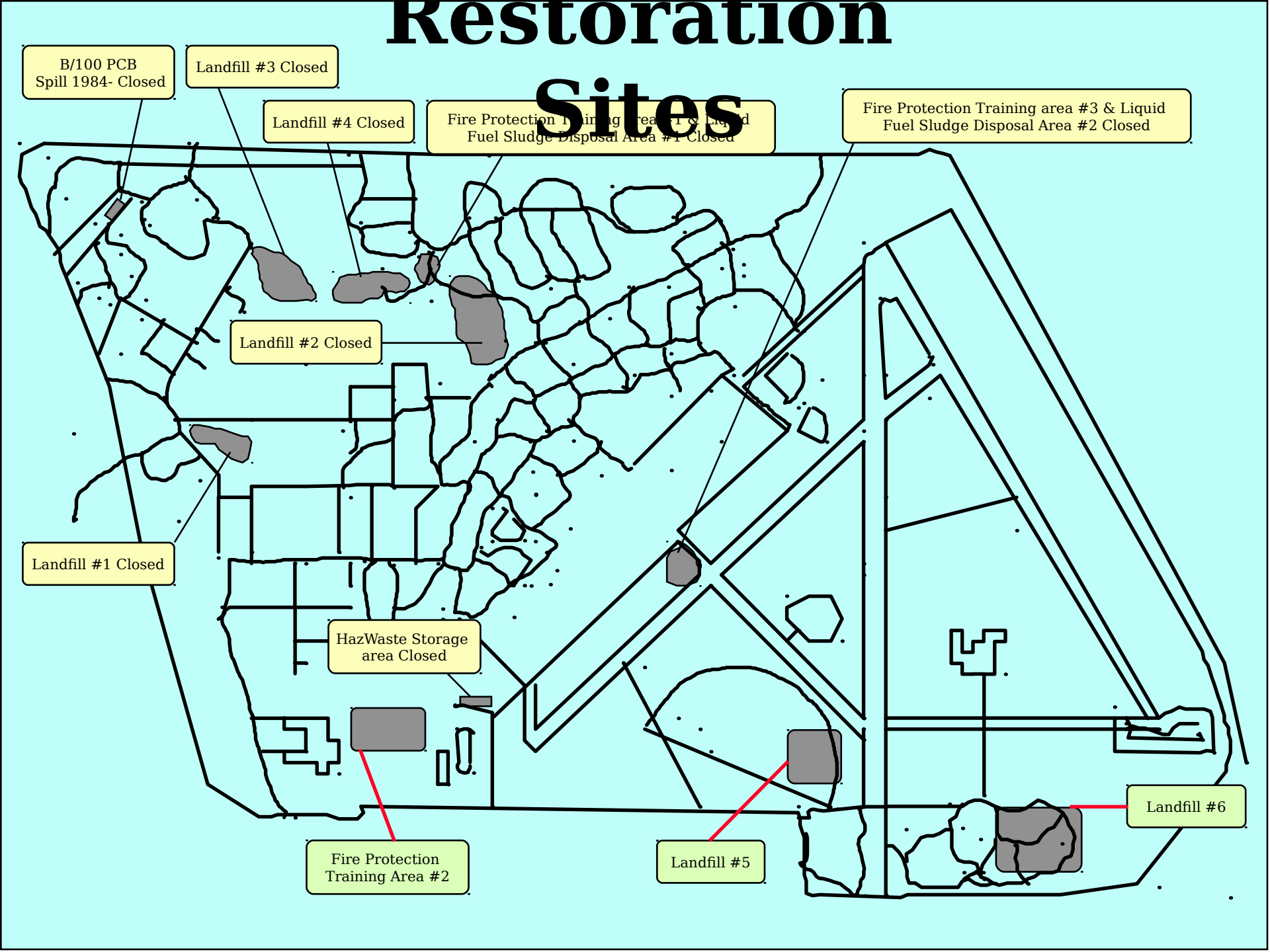
CWA

- IMPROVEMENT OF WATER RESOURCES
- PERMIT TO DISCHARGE TO CITY SYSTEM
- STORMWATER PERMIT
- BASE HAS THREE WETLANDS

CERCLA

- CLEAN UP OF HAZARDOUS WASTE SITES
- BASE HAS 15 IRP SITES (12 ARE CLOSED) - CLEANUP, MONITORING, AND USE

Restoration Sites


B/100 PCB Spill 1984- Closed
Landfill #3 Closed
Landfill #4 Closed
Fire Protection Training area #3 & Liquid Fuel Sludge Disposal Area #2 Closed
Landfill #2 Closed
Landfill #1 Closed
HazWaste Storage area Closed
Fire Protection Training Area #2
Landfill #5
Landfill #6

FIFRA

- **REGULATION OF PESTICIDE USE**
- **NEW PERMITS AND LICENSES**

LLRWPA

- **REGULATION OF LOW LEVEL RADIOACTIVE WASTE**
- **ONE SITE AT THE BASE**

TSCA

- **REGULATION OF CHEMICAL SUBSTANCES**
- **NO PCBs**

OSHA

- **WORKER SAFETY**
- **ISSUE IF AF BASE THAT IS DEVELOPED WITH NON-AF USES**

SUMMARY

- **ENVIRONMENTAL ISSUES ARE BIG PLAYERS**
- **ISSUES ARE MANAGEABLE, BUT SCHEDULE MUST ADDRESS**